

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

WILLIAM E. JOHNSON, II,

Plaintiff,

v.

CIVIL ACTION NO. 2:11cv14

EXPERIAN INFORMATION SOLUTIONS, INC.

and

PORTFOLIO RECOVERY ASSOCIATES, LLC,

Defendants.

**MEMORANDUM IN SUPPORT OF MOTION FOR EXTENSION
OF TIME TO DISCLOSE EXPERT**

NOW COMES the Plaintiff William E. Johnson, II, by counsel, and for his Memorandum in Support of his Motion for Extension of Time to Disclose Expert states as follows:

1. Plaintiff has not yet been able to finalize arrangements with his intended expert and anticipates doing so on a daily basis.
2. The extension of time is not sought for delay purposes, but so that justice may be served.
3. Trial proceedings are in a very early stage.
4. No party will suffer prejudice as a result of this extension of time.
5. The extension of time will not cause any delay in the trial proceedings as no extension for any other discovery deadline is requested.
6. Counsel for the Defendants has no objection to the requested extension of time.

WHEREFORE, Plaintiff prays this Honorable Court grant his Motion for Extension of Time to Disclose Expert pursuant to Rule 26(a)2(A) from Monday, June 13, 2011, to on or before Tuesday, June 21, 2011.

WILLIAM E. JOHNSON, II

/s/

Gary L. Abbott, Esq.
VSB #68829
Attorney for Plaintiff
Consumer Litigation Associates, P.C.
12515 Warwick Boulevard, Suite 100
Newport News, Virginia 23606
(757) 930-3660 - Telephone
(757) 930-3662 – Facsimile
garyabbott9@msn.com

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of June, 2011, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Steven R. Zahn, Esq. (VSB#43332)
Portfolio Recovery Associates, LLC
140 Corporate Boulevard
Office of General Counsel
Norfolk, VA 23502
Phone: (757) 321-2512
Fax: (757) 321-2518
szahn@portfoliorecovery.com
Attorney for Portfolio Recovery Associates

David N. Anthony
Virginia State Bar No. 31696
Attorney for Experian Information Solutions, Inc.
TROUTMAN SANDERS LLP
1001 Haxall Point
Richmond, Virginia 23219
Telephone No.: (804) 697-5410
Facsimile No.: (804) 698-5118
Email: david.anthony@troutmansanders.com

_____/s/
Gary L. Abbott, Esq.
VSB #68829
Attorney for Plaintiff
Consumer Litigation Associates, P.C.
12515 Warwick Boulevard, Suite 100
Newport News, Virginia 23606
(757) 930-3660 - Telephone
(757) 930-3662 – Facsimile
garyabbott9@msn.com